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U.S. DISTRICT COURT E.D.N.Y.  
★ **SEP 04 2015** ★  
LONG ISLAND OFFICE

September 3, 2015

**BY HAND DELIVERY**

Hon. Joan M. Azrack  
United States District Court  
Eastern District of New York  
100 Federal Plaza  
Central Islip, New York 11722

Re: 15-cv-0014; 14-cv-0015 (JMA),  
Berlin v. Zaretsky et al

Your honor,


As per the court's order, appellant's reply brief was due this Monday August 31, 2015. Despite having worked to complete it timely, appellant was unable to do so due to an inadvertent delay. It is respectfully requested that the court accept the late filing of this reply brief.

Last week I got re-traumatized while working on the reply, going through the record as well as the state record, in trying to defend anew on this reply. It triggered very painful and traumatizing events, re-living them and making it impossible to continue to work. I have managed to recover somewhat allowing to complete the reply albeit raw and with difficulty.

The reply contains more than the allowed limit of 7,500 words, relying on the court's order allowing to file a combined brief on both appeals. I apologize that I had been unable to edit the draft and shorten, as I had very little time to finish it in a hurry not to delay it anymore, and hope it will suffice.

Thank you for considering this matter.

Very truly yours,

  
Ahron Berlin

cc: Brian Hufnagel, Esq.,  
(bhufnagel@forchellilaw.com)

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